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| 1 | JOHN D. GIFFIN, CASB No. 89608 | | |
| 2 | john.giffin@kyl.com JENNIFER M. PORTER, CASB No. 261508 | | |
| 3 | jennifer.porter@kyl.com KEESAL, YOUNG & LOGAN | | |
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| 5 | Telephone: (415) 398-6000 Facsimile: (415) 981-0136 | | |
| 6 | Attorneys for Defendant | | |
| 7 | MAERSK LINE, LIMITED (erroneously named a and A.P. Moller) | s Maersk Lines Limited | |
| 8 | | | |
| 9 | Philip R. Weltin, Esq. SBN 46141 WELTIN STREB & WELTIN, LLP | | |
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| 13 | Attorneys for Plaintiff DARIN ALLEN | | |
| 14 | | | |
| 15 | UNITED STATES DISTRICT COURT | | |
| 16 | NORTHERN DISTR | ICT OF CALIFORNIA | |
| 17 | | | |
| 18 | DARIN ALLEN, | Case No. 13-cv-05812-TEH | |
| 19 | Plaintiff, | Action Filed: October 29, 2013 | |
| 20 | VS. | MODIFIED STIPULATION AND [PROPOSED] ORDER | |
| 21 | MAERSK LINES LIMITED; A.P. MOLLER; | TO CONTINUE PRETRIAL DISCLOSURES, OBJECTIONS TO EXHIBITS AND MOTIONS IN LIMINE | |
| 22 | DOES 1 TO 40, Defendants. |) EARIBITS AND MOTIONS IN LIMINE | |
| 23 | Defendants. |)) Trial Datas Dagamhar 1, 2015 | |
| 24 | | Trial Date: December 1, 2015 | |
| 25 | | | |
| 26 | WHEREAS, MAERSK LINE, LIMITED ("Defendant") and DARIN ALLEN ("Plaintiff") | | |
| 27 | (collectively referred to as "Parties") have diligently engaged in settlement discussions and attended a | | |
| 28 | global mediation of the matter on October 28, 2015 along with Plaintiff's comp carrier, a third party to | | |
| | | - 1 - KYL SF693176 | |

| 1 | this matter. | |
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| 2 | WHEREAS, as a result of that mediation, the Parties and Plaintiff's comp carrier are in the | |
| 3 | process of considering a mediator's proposal for a global resolution of this matter, which expires on | |
| 4 | November 11, 2015. | |
| 5 | WHEREAS, the Parties agree that additional time is needed to complete pretrial submissions | |
| 6 | and file motions in limine in order to focus on potential settlement and minimize potentially | |
| 7 | unnecessary costs should the matter be resolved. | |
| 8 | NOW, THEREFORE, IT IS HEREBY STIPULATED AND REQUESTED by the Parties that | |
| 9 | the pretrial deadlines by which Parties must comply be continued as follows: | |
| 10 | Pretrial Conference Statement: November 13, 2015 | |
| 11 | Objections to Exhibits: November 13, 2015 | |
| 12 | Motions in Limine: November 13, 2015 | |
| 13 | Oppositions to Motions in Limine: November 19, 2015 | |
| 14 | NOW, THEREFORE, THE PARTIES HEREBY STIPULATE, to the above discovery | |
| 15 | schedule or such other dates thereafter as may be convenient to the Court. | |
| 16 | | |
| 17 | DATED: November 3, 2015 /s/ Jennifer M. Porter JOHN D. GIFFIN | |
| 18 | JENNIFER M. PORTER KEESAL, YOUNG & LOGAN | |
| 19 | Attorneys for Defendant MAERSK LINE, LIMITED (erroneously named | |
| 20 | as Maersk Lines Limited and A.P. Moller) | |
| 21 | | |
| 22 | DATED: November 3, 2015 /s/ Philip R. Weltin PHILIP R. WELTIN | |
| 23 | WELTIN, STREB & WELTIN LLP Counsel for Plaintiff DARIN ALLEN | |
| 24 | | |
| 25 | I, Jennifer Porter, attest that concurrence in the filing of this document has been obtained from each of the signatories. I declare under penalty of perjury under the laws of the United States of America | |
| 26 | that the foregoing is true and correct. | |
| 27 | | |
| 28 | | |
| | -2 - KYL_SF693176 | |

1 **ORDER** 2 Having reviewed the Stipulation of the Parties and finding good cause, IT IS HEREBY 3 ORDERED that the discovery deadlines are continued to the following dates: : Pretrial Conference Statement: November 13, 2015 4 Objections to Exhibits: 5 November 13, 2015 6 Motions in Limine: November 13, 2015 7 Oppositions to Motions in Limine: November 19, 2015 The Pretrial Conference is continued to Monday, 11/23/2015, at 3:00 PM. 8 9 IT IS SO ORDERED. 10 11 DATED: 11/04/2015 AS MODIFIED 12 THE UNI Judge Thelton E. Henderson 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

KYL SF693176